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April 6, 2023

Hon. Sharon King
U.S. Magistrate Judge
District of New Jersey
Clarkson S. Fisher Building
& U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Via ECF

RE: `Doe v. Small
Case No.: 1: 21-cv-11189-JHR-SAK

Dear Judge King:

The parties have met and conferred about potential electronic discovery issues. We do not anticipate any significant electronic discovery. The parties have agreed to produce electronically stored documents in PDF format. Should a party require the metadata from a specific document, it will be obtained on a case-by-case basis. with the party making the request bearing any associated costs.

Respectfully,

ss/ Lawrence A. Katz, Esquire
LAWRENCE A. KATZ
Counsel for Plaintiff

Cc: All counsel via ECF.

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